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August 18, 2023

VIA ECF

Hon. Paul G. Gardephe
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:

A handwritten signature of Paul G. Gardephe in black ink.

Paul G. Gardephe, U.S.D.J.

Dated: August 22, 2023

Re: *Trump v. Simon & Schuster, et al.*, Case No. 1:23-cv-06883 (PGG)

Dear Judge Gardephe:

We represent Defendants Robert Woodward, Simon & Schuster, Inc. and Paramount Global (the “Defendants”) in the above-referenced matter. We write on behalf of all parties to respectfully request a short extension of the briefing schedule set forth by the Order of this Court dated August 17, 2023 (*see* Dkt. 52, the “Scheduling Order”) and an order confirming that the word-limit extensions permitted by the Northern District of Florida apply to the parties’ forthcoming amended motion to dismiss papers. *See* Dkt. 34. 46.

Defendants intend to file their amended moving papers as currently scheduled on August 23, 2023. Given scheduling conflicts caused by the forthcoming Labor Day holiday on September 4, 2023, the parties respectfully request that the deadline for plaintiff Donald Trump (“Plaintiff”) to file his opposition be extended from August 30, 2023 to September 1, 2023. The parties further request that Defendants’ deadline to file their reply brief be extended from September 6, 2023 to September 11, 2023. Pursuant to Your Honor’s Individual Rule I.A, the parties have met and conferred and Plaintiff consents to the requested extensions. The parties have not previously requested an extension of the dates set forth in the Scheduling Order.

The parties also respectfully request an order confirming that the previously-ordered word-limit extensions apply to their amended motion to dismiss papers. Specifically, the Northern District of Florida set a 10,000 word limit for the moving and opposition briefs (which is approximately 6 pages more than this Court’s default 25-page limit with 12-point font) and 4,500 words for the reply (which represents an approximately 4.5 page extension). Plaintiff has also consented to this request.

We appreciate the Court’s attention to this matter.

Hon. Gardephe
August 11, 2023
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Respectfully submitted,

/s/ Elizabeth A. McNamara

Elizabeth A. McNamara

cc: Counsel of Record (via ECF)